

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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FELIPE RODRIGUEZ,

**DECLARATION OF MARK
D. ZUCKERMAN**
Plaintiff,

-against-

THE CITY OF NEW YORK, et. al.,

21 CV 1649 (AMD)(RLM)

Defendants.
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MARK D. ZUCKERMAN, an attorney duly admitted to practice in the State of New York and the Eastern District of New York, declares under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following statements are true and correct:

1. I am a Senior Counsel in the office of Georgia M. Pestana, Corporation Counsel of the City of New York, attorney for defendants City of New York, John Beisel, George Zaroogian, John Califano, John Wilde and Jerry Fennel. As such, I am familiar with the facts stated below and submit this declaration to place the relevant information and document on the record in further support of defendants' motion to dismiss pursuant to Rule 12(b)(6), Fed. R. Civ. P.

2. Annexed hereto as Exhibit A is a true and exact copy of the transcript of proceedings from July 12, 2021, herein.

Dated: New York, New York
October 19, 2021

/s/ Mark D. Zuckerman
Mark D. Zuckerman